

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS – DALLAS DIVISION

STANLEY SACKYFIO

PLAINTIFF,

V.

TOM J. VILSACK, SECRETARY OF
DEPARTMENT OF AGRICULTURE
DEFENDANT.

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3:10-CV-1469

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Stanley Sackeyfio moves this Court for a ten day extension of time until August 25, 2011, in which to file his response to Defendant’s Motion for Summary Judgment. In support of this motion, plaintiff would show:

1. Plaintiff’s Response brief is due August 25, 2011.
2. On July 25, 2011, Plaintiff counsel left for a ten day summer vacation through August 5, 2011.
3. Plaintiff, therefore, has only had about ten days to respond to the Motion.
4. In addition to this response, plaintiff also had an appellate brief which is now also due on August 15, 2011.
5. Because of counsel’s travel plans and other commitments, she has not, and likely will not, be finished.
6. Plaintiff’s counsel conferred with Defendant’s counsel who is not opposed to a ten day extension until August 25, 2011.

7. Plaintiff seeks an order granting her an extension of time until August 25, 2011, to file a response to Defendant's Motion for Summary Judgment in the interest of justice, and not for any improper purpose.

Dated: August 15, 2011.

Respectfully submitted,

s/ N. Sue Allen

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